

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

REBECCA TERRY,

Plaintiff,

-vs-

Case No. 17-CV-1112

COUNTY OF MILWAUKEE, et al.

Defendants.

Deposition of DASHYLA ELLIOTT

Thursday, April 24th, 2018

10:03 a.m.

at

LEIB, KNOTT & GAYNOR, LLC
219 North Milwaukee Street, Suite 710
Milwaukee, Wisconsin

Reported by: Wendy L. Hanneman, RPR

<p style="text-align: right;">Page 6</p> <p>1 A That's correct.</p> <p>2 Q Okay. Where are you currently employed?</p> <p>3 A Outagamie County Sheriff.</p> <p>4 Q Outagamie County. What state is that?</p> <p>5 A It's in Wisconsin.</p> <p>6 Q I'm only asking because it's Allegheny County out</p> <p>7 in Virginia.</p> <p>8 A Oh, okay.</p> <p>9 MS. KUGLER: It's Outagamie County.</p> <p>10 BY MS. DAVIS:</p> <p>11 Q Oh, could you spell that for me?</p> <p>12 A O-U-T-A-G-A-M-I-E.</p> <p>13 Q What are you currently doing with Outagamie</p> <p>14 County?</p> <p>15 A Telecommunicator, dispatch.</p> <p>16 Q Is that with a particular department, or is it a --</p> <p>17 A With the sheriff's office, I'm sorry, yes. Mm-hmm.</p> <p>18 Q And prior to working with Outagamie County, what</p> <p>19 was your position?</p> <p>20 A I was a correctional officer.</p> <p>21 Q When did you stop doing that?</p> <p>22 A In January of this year.</p> <p>23 Q When did you start?</p> <p>24 A February of '12. 2012.</p> <p>25 Q Okay. And was that all with the Milwaukee County</p>	<p style="text-align: right;">Page 8</p> <p>1 you work?</p> <p>2 A Loft. It was called Ann Taylor Loft at the time.</p> <p>3 Q Mm-hmm. And how long did you work there?</p> <p>4 A October of 2006 until December 2010.</p> <p>5 Q Okay. Where did you work before that, if you</p> <p>6 remember?</p> <p>7 A Dillard's. It was a department store.</p> <p>8 Q Mm-hmm. Any other jobs prior to that?</p> <p>9 A Best Buy. This is all part-time jobs in college.</p> <p>10 Q Okay. Was Dillard's part time as well?</p> <p>11 A Yes. The only full-time job I had was Milwaukee</p> <p>12 County Jail.</p> <p>13 Q Okay. Got it. And when did you graduate from</p> <p>14 college?</p> <p>15 A In 2005.</p> <p>16 Q What college did you go to?</p> <p>17 A UW-Milwaukee.</p> <p>18 Q So prior to working with the Milwaukee County Jail,</p> <p>19 did you have any prior correctional officer</p> <p>20 experience?</p> <p>21 A No.</p> <p>22 Q Any other law enforcement experience?</p> <p>23 A No.</p> <p>24 Q When you were hired as a corrections officer with</p> <p>25 Milwaukee County, did you undergo any training?</p>
<p style="text-align: right;">Page 7</p> <p>1 Sheriff's Office?</p> <p>2 A Yes. But it was -- I started out at the Milwaukee</p> <p>3 House of Corrections. It was all under the</p> <p>4 Milwaukee County Sheriff's Office at the time,</p> <p>5 though.</p> <p>6 Q Okay. So you started in February of 2012 at the</p> <p>7 Milwaukee County House of Corrections?</p> <p>8 A Yes.</p> <p>9 Q How long were you there?</p> <p>10 A Until November of 2012.</p> <p>11 Q And then where did you go?</p> <p>12 A To Milwaukee County Jail.</p> <p>13 Q And were you there throughout -- until January</p> <p>14 2018?</p> <p>15 A Yes.</p> <p>16 Q Okay. When you left the Milwaukee County Jail,</p> <p>17 were you a corrections officer, or were you</p> <p>18 promoted at any point?</p> <p>19 A I was a corrections officer.</p> <p>20 Q Prior to working with the Milwaukee County Jail,</p> <p>21 where did you work?</p> <p>22 A I worked for Aldi, Inc.</p> <p>23 Q How long did you work there?</p> <p>24 A February 2010 until February 2012.</p> <p>25 Q Okay. And prior to working with Aldi, where did</p>	<p style="text-align: right;">Page 9</p> <p>1 A Yes.</p> <p>2 Q Okay. Was that the academy?</p> <p>3 A Yes.</p> <p>4 Q Okay. How long was that training program?</p> <p>5 A Six-week training.</p> <p>6 Q Was there any other training after that?</p> <p>7 A Annual training.</p> <p>8 Q What was the annual training?</p> <p>9 A I don't know. It varied every year. I was there</p> <p>10 for six years, so I don't know what training was</p> <p>11 about every time.</p> <p>12 Q Okay.</p> <p>13 A I don't remember, I'm sorry.</p> <p>14 Q No, that's fair. Were there any annual trainings</p> <p>15 that were repeated?</p> <p>16 A Yes.</p> <p>17 Q Okay. Do you remember which ones those were?</p> <p>18 A CPR. Um, dealing with, um, mental health inmates.</p> <p>19 Q Okay.</p> <p>20 A Always POSC, which is basically subject control.</p> <p>21 MR. ARNOLD: I'm sorry, what's the word</p> <p>22 you're using?</p> <p>23 THE WITNESS: POSC is an acronym.</p> <p>24 P-O-S-C.</p> <p>25</p>

<p style="text-align: right;">Page 22</p> <p>1 A The pod access?</p> <p>2 Q Yeah.</p> <p>3 MR. ARNOLD: If you know.</p> <p>4 THE WITNESS: The pod is the SMU.</p> <p>5 MS. DAVIS: Okay.</p> <p>6 Q And then going down to IM 8.1.7 on the same page,</p> <p>7 the first bullet point under the infirmary,</p> <p>8 "Officer shall: Conduct 30-minute inspections of</p> <p>9 inmate cells and general living areas and document</p> <p>10 the inspection in the pod logbook," correct?</p> <p>11 A Yes.</p> <p>12 Q Did you have to conduct these 30-minute inspections</p> <p>13 when you were stationed in the SMU?</p> <p>14 A Yes.</p> <p>15 Q Were there ever any instructions during the roll</p> <p>16 call about conducting these inspections?</p> <p>17 A Conducting the inspections in general, yes.</p> <p>18 Q Okay. When you say "in general", do you mean in</p> <p>19 all the housing units?</p> <p>20 A Yes.</p> <p>21 Q Okay. Were there ever -- well, earlier you said</p> <p>22 that there were reminders of how to enter jail logs</p> <p>23 at roll call?</p> <p>24 A Yes.</p> <p>25 Q Were there reminders about entering the information</p>	<p style="text-align: right;">Page 24</p> <p>1 BY MS. DAVIS:</p> <p>2 Q Okay. I'm handing you what's been marked as</p> <p>3 Exhibit Number 4. You can take a second to look</p> <p>4 that over.</p> <p>5 A Okay.</p> <p>6 Q Okay. Do you recognize this document?</p> <p>7 A Mm-hmm.</p> <p>8 Q Do you remember receiving a copy of it?</p> <p>9 A I don't --</p> <p>10 Q Okay.</p> <p>11 A -- remember.</p> <p>12 Q Do you remember having any trainings on an updated</p> <p>13 policy for the Special Medical Unit?</p> <p>14 A I don't remember.</p> <p>15 Q And then at the top of the first page, it says,</p> <p>16 "Second revision, 10/20/14," correct?</p> <p>17 A Mm-hmm.</p> <p>18 Q And that was during your time at the Milwaukee</p> <p>19 County Jail, correct?</p> <p>20 A That's true.</p> <p>21 Q Okay. You mentioned that you were stationed in the</p> <p>22 Special Medical Unit occasionally, right?</p> <p>23 A Yes.</p> <p>24 Q While you were stationed there, did you have any</p> <p>25 training on how to communicate with the medical</p>
<p style="text-align: right;">Page 23</p> <p>1 for 30-minute inspections at roll call?</p> <p>2 MS. KUGLER: Objection. Form.</p> <p>3 THE WITNESS: Just make sure we were</p> <p>4 doing within 30 minutes.</p> <p>5 BY MS. DAVIS:</p> <p>6 Q Okay. And when you were trained on conducting the</p> <p>7 30-minute inspections, were you told how to either</p> <p>8 start or stop a timer that would monitor when you</p> <p>9 did the inspection?</p> <p>10 A I was initially trained at the House of</p> <p>11 Corrections, and we did not start or -- start</p> <p>12 inspections, but we always marked them complete.</p> <p>13 Q Okay. And was there any subsequent training at the</p> <p>14 jail, as opposed to at House of Corrections, about</p> <p>15 entering the inspection time?</p> <p>16 A When I came down, some officers were doing it like</p> <p>17 that, but some were not.</p> <p>18 Q Okay.</p> <p>19 A I was told that you do everything that was issued a</p> <p>20 button in the jail log, and there was no start</p> <p>21 button for inspections in the jail log.</p> <p>22 Q Okay. Do you remember receiving any updated</p> <p>23 policies about the infirmary or the SMU?</p> <p>24 A I don't remember.</p> <p>25 (Exh. 4 marked for identification.)</p>	<p style="text-align: right;">Page 25</p> <p>1 staff at the jail?</p> <p>2 MS. KUGLER: Objection. Form.</p> <p>3 THE WITNESS: That was covered in our</p> <p>4 regular training.</p> <p>5 BY MS. DAVIS:</p> <p>6 Q In the regular training, okay. Do you remember the</p> <p>7 training about communicating with the medical</p> <p>8 staff?</p> <p>9 A Yes.</p> <p>10 Q Do you remember what subjects were covered?</p> <p>11 A Yes.</p> <p>12 Q Okay. Could you tell me a little bit about that</p> <p>13 training?</p> <p>14 A As far as communication with the nurses, you call</p> <p>15 them when an inmate was in distress, call them,</p> <p>16 talk to -- I don't know, you just talk to them if</p> <p>17 you need to.</p> <p>18 Q Okay. And how would you know if an inmate was in</p> <p>19 distress in the Special Medical Unit?</p> <p>20 A They would either yell out and tell you, they'd be</p> <p>21 in the day room and tell you, or they'll use their</p> <p>22 call button.</p> <p>23 Q And during those 30-minute inspections, or the</p> <p>24 inspections that were every 30 minutes, did you</p> <p>25 have to check and see if any of the inmates were in</p>

<p style="text-align: right;">Page 26</p> <p>1 distress?</p> <p>2 MS. KUGLER: Objection. Form.</p> <p>3 THE WITNESS: It was a visual inspection.</p> <p>4 BY MS. DAVIS:</p> <p>5 Q What is a visual inspection?</p> <p>6 A Looking at the individual to see if they're in</p> <p>7 obvious distress.</p> <p>8 Q Did you ever work in the Special Needs Unit?</p> <p>9 A Rarely, but I have worked in there before.</p> <p>10 Q Okay. Did you receive any training on working in</p> <p>11 the Special Needs Unit?</p> <p>12 A Rarely -- no, because I hardly ever worked in</p> <p>13 there.</p> <p>14 Q Did you --</p> <p>15 A I could tell you that if I worked in there, it was</p> <p>16 always with a partner that was trained in that</p> <p>17 area, and that the times that I have worked in</p> <p>18 there, it was on a special watch.</p> <p>19 Q So you said you worked with people that were</p> <p>20 trained to work in there?</p> <p>21 A (Witness nods head.)</p> <p>22 Q Do you know what that training entailed?</p> <p>23 A Not all of it, no.</p> <p>24 Q Do you know some of it?</p> <p>25 A No, I don't know specifically. I was given a</p>	<p style="text-align: right;">Page 28</p> <p>1 BY MS. DAVIS:</p> <p>2 Q Handing you what's been marked as Exhibit Number 5.</p> <p>3 We don't need to look through the whole thing, I'm</p> <p>4 just going to ask you a few questions.</p> <p>5 A Okay.</p> <p>6 Q I'm giving you the whole document, just because we</p> <p>7 have the whole document. Do you recognize this</p> <p>8 jail training?</p> <p>9 A Yes.</p> <p>10 Q Okay. Did you receive a copy of it ever?</p> <p>11 A Yes.</p> <p>12 Q When did you receive a copy of it?</p> <p>13 A When I began in training with the academy.</p> <p>14 Q Okay. So every CO went through a training on this</p> <p>15 "Supervise "Special" Needs Inmates/Crisis</p> <p>16 Intervention"?</p> <p>17 A In training.</p> <p>18 Q To the best of your recollection, during the</p> <p>19 training guide -- or during the training for this</p> <p>20 guide, were you trained on how to determine if an</p> <p>21 inmate was undergoing what was considered normal</p> <p>22 emotional distress?</p> <p>23 MS. KUGLER: Objection. Form.</p> <p>24 THE WITNESS: Yes.</p> <p>25</p>
<p style="text-align: right;">Page 27</p> <p>1 general training.</p> <p>2 Q Mm-hmm.</p> <p>3 A But not the more specific word that they called it,</p> <p>4 CIT training.</p> <p>5 Q Do you know what that stands for?</p> <p>6 A No, because I'm not trained in it.</p> <p>7 Q Okay, that's okay. Who decided who was given the</p> <p>8 CIT training?</p> <p>9 A Um, it was usually a roll call issue where they</p> <p>10 asked if you wanted specialized training in this</p> <p>11 area, to sign up for it.</p> <p>12 Q Was there any other specialized training announced</p> <p>13 during roll call?</p> <p>14 A As far as what? It was always announced that if</p> <p>15 you wanted additional training in different areas.</p> <p>16 Q Okay. Do you remember any of the areas that they</p> <p>17 offered specialized or additional training on?</p> <p>18 A Yeah, if you wanted to be an AFIS officer, a</p> <p>19 weapons officer. If you wanted to be trained in</p> <p>20 release. Different areas. All areas of the jail.</p> <p>21 If you wanted to be a CERT member, Corrections</p> <p>22 Emergency Response Team. Yeah.</p> <p>23 Q Okay. All right.</p> <p>24 (Exh. 5 marked for identification.)</p> <p>25</p>	<p style="text-align: right;">Page 29</p> <p>1 BY MS. DAVIS:</p> <p>2 Q Okay. Were you trained on how to determine if an</p> <p>3 inmate was undergoing possibly serious emotional</p> <p>4 distress?</p> <p>5 A Yes. General training.</p> <p>6 Q Were you trained on how to supervise inmates who</p> <p>7 may be suicide risks?</p> <p>8 A Yes.</p> <p>9 Q Were you trained on how to supervise inmates with</p> <p>10 intellectual disabilities?</p> <p>11 A Yes.</p> <p>12 Q Were you trained on how to intervene in a crisis?</p> <p>13 A Yes.</p> <p>14 Q Was this training specific for inmates who were</p> <p>15 housed in the Special Needs Unit?</p> <p>16 A Um, well, sometimes you don't -- you see it in the</p> <p>17 booking room, you don't always see it in -- when</p> <p>18 they make it this far.</p> <p>19 Q So is it fair to say that you would apply this</p> <p>20 training to any area of the jail that you were</p> <p>21 working in?</p> <p>22 A Yes.</p> <p>23 Q And was there additional training offered during</p> <p>24 roll call for working in the Special Needs Unit?</p> <p>25 A There was sometimes roll call reminders about that,</p>

<p style="text-align: right;">Page 30</p> <p>1 yeah.</p> <p>2 Q Okay. Was there any certification that you</p> <p>3 received after this training?</p> <p>4 MR. ARNOLD: Object to the form of the</p> <p>5 question. Which training are you referring to?</p> <p>6 BY MS. DAVIS:</p> <p>7 Q Was there any certification that you received after</p> <p>8 the Supervise "Special" Needs Inmates/Crisis</p> <p>9 Intervention training?</p> <p>10 MS. KUGLER: Thank you.</p> <p>11 THE WITNESS: You mean additional</p> <p>12 training?</p> <p>13 BY MS. DAVIS:</p> <p>14 Q Any certification?</p> <p>15 A Me specifically, no.</p> <p>16 Q Okay. Do you know how long the training was for</p> <p>17 the Supervise "Special" Needs Inmates/Crisis</p> <p>18 Intervention training?</p> <p>19 A No.</p> <p>20 Q Okay.</p> <p>21 A Because I'm not trained in it.</p> <p>22 Q So when they gave you this guide during the</p> <p>23 academy, did they do any training related to it?</p> <p>24 A We got very general training. And this -- I'm not</p> <p>25 even sure if this is the right document, if this is</p>	<p style="text-align: right;">Page 32</p> <p>1 suicide. Um, I do remember talking about getting</p> <p>2 inmates PSWs, which is psych social workers, if</p> <p>3 they asked for them.</p> <p>4 Q Mm-hmm.</p> <p>5 A Some of this stuff was covered, yes.</p> <p>6 Q Okay. Can you tell me which areas were covered,</p> <p>7 outside of the suicide risk, suicide, and PSW?</p> <p>8 MS. KUGLER: Objection. Form,</p> <p>9 foundation.</p> <p>10 MR. ARNOLD: If you remember.</p> <p>11 MS. DAVIS: If you remember.</p> <p>12 THE WITNESS: That's all I remember.</p> <p>13 BY MS. DAVIS:</p> <p>14 Q Okay. Do you remember going through any training</p> <p>15 on jail health care while you were in the academy?</p> <p>16 A Yes.</p> <p>17 Q Do you remember during that training there was a</p> <p>18 PowerPoint that was used to go over the</p> <p>19 information?</p> <p>20 A I don't remember, but it was almost a PowerPoint</p> <p>21 for everything in training, so.</p> <p>22 Q Okay.</p> <p>23 (Exh. 6 marked for identification.)</p> <p>24 BY MS. DAVIS:</p> <p>25 Q I'm handing you what's marked as Exhibit 6.</p>
<p style="text-align: right;">Page 31</p> <p>1 a CIT training document, or if this is basically</p> <p>2 how to spot inmates that may be going through a</p> <p>3 crisis.</p> <p>4 Q Okay.</p> <p>5 A So I don't know by looking at this. This might be</p> <p>6 the specialized training document, I'm not sure.</p> <p>7 Q Okay.</p> <p>8 A For the CIT.</p> <p>9 Q So when you did receive training on recognizing</p> <p>10 emotional distress at the academy, about how long</p> <p>11 was that training?</p> <p>12 A It was six years ago, I don't remember.</p> <p>13 Q Okay. Earlier you mentioned that you had that</p> <p>14 mental health training hosted by Armor in</p> <p>15 October 2017, right?</p> <p>16 A What was the question?</p> <p>17 Q You mentioned earlier that there was a mental</p> <p>18 health training in October 2017?</p> <p>19 A Yes.</p> <p>20 Q Did that cover any of the topics that are covered</p> <p>21 in this training guide?</p> <p>22 A I didn't look through all of it, but.</p> <p>23 Q Take your time and you can flip through the table</p> <p>24 of contents if you want.</p> <p>25 A I do remember talking about suicide risk and</p>	<p style="text-align: right;">Page 33</p> <p>1 A Mm-hmm.</p> <p>2 Q Again, we're not going to go through all of this</p> <p>3 document, I just wanted to give you the whole thing</p> <p>4 in case you wanted to look through it. Do you</p> <p>5 recognize this document?</p> <p>6 A Um, yes.</p> <p>7 Q Is it one of the documents that you received during</p> <p>8 the academy?</p> <p>9 MR. ARNOLD: If you know.</p> <p>10 THE WITNESS: It probably was. I don't</p> <p>11 remember every single document that was given to me</p> <p>12 in training.</p> <p>13 BY MS. DAVIS:</p> <p>14 Q Okay. That's fair. So to the best of your</p> <p>15 recollection during the training on jail health</p> <p>16 care, do you remember being trained on assisting</p> <p>17 people housed in the Special Medical Unit?</p> <p>18 A It was no specialized training for that.</p> <p>19 Q Okay. Did the training include instructions on</p> <p>20 helping to provide health care to inmates?</p> <p>21 A Yes.</p> <p>22 Q Did it include training on administering</p> <p>23 medication?</p> <p>24 A We don't give medication.</p> <p>25 Q Okay. Who gives the medication in the jail?</p>

<p style="text-align: right;">Page 34</p> <p>1 A The nurse.</p> <p>2 Q And do you ever have to notify the nurse that an inmate needs medication?</p> <p>3</p> <p>4 A They have med passes. We notify a nurse if an inmate says they didn't get their meds.</p> <p>5</p> <p>6 Q Was there any training on following medical orders?</p> <p>7 A Yes.</p> <p>8 Q To the best of your recollection, were you trained on the duty to care for inmates?</p> <p>9</p> <p>10 A Yes.</p> <p>11 MS. KUGLER: Objection. Form.</p> <p>12 BY MS. DAVIS:</p> <p>13 Q To the best of your recollection, were you trained on how to respond to requests for medical care?</p> <p>14</p> <p>15 A Yes.</p> <p>16 Q Going back to the training on the duty to care for inmates, do you remember any part of that training in particular?</p> <p>17</p> <p>18</p> <p>19 A Basically that we have a duty to get inmates help if they ask. Um, and if we don't do that, we could be criminally charged and sued civilly.</p> <p>20</p> <p>21</p> <p>22 Q So they walked you through legal, like I guess legal consequences of the duty to --</p> <p>23</p> <p>24 A Yes.</p> <p>25 Q Okay. I asked you about PowerPoints, so we're</p>	<p style="text-align: right;">Page 36</p> <p>1 Conduct screening for inmate health." Were you</p> <p>2 trained on conducting screenings for inmate health?</p> <p>3 A I don't know what that is.</p> <p>4 Q Okay. Going down to the slide on the bottom right side. Do you remember being trained on responding to inmate needs or request for medical care?</p> <p>5</p> <p>6</p> <p>7 A Yes.</p> <p>8 Q Okay.</p> <p>9 MR. ARNOLD: I'm sorry, where were you referring to?</p> <p>10</p> <p>11 MS. DAVIS: Page 10, bottom right slide.</p> <p>12 MR. ARNOLD: Okay, thank you.</p> <p>13 MS. DAVIS: Mm-hmm.</p> <p>14 Q And then if we go to Page 11, the top right slide. Were you trained on controlling, administering, and/or delivering medication?</p> <p>15</p> <p>16</p> <p>17 A We don't administer medication, the nurse does that.</p> <p>18</p> <p>19 Q Okay. Were you trained on providing health care, emergency and non-emergency?</p> <p>20</p> <p>21 A I call the nurse. I don't provide health care, I'm not trained to do that.</p> <p>22</p> <p>23 Q Okay. And, then, were you trained to maintain health care records?</p> <p>24</p> <p>25 A I don't -- I don't maintain health care records.</p>
<p style="text-align: right;">Page 35</p> <p>1 going to go ahead and look through this one.</p> <p>2 (Exh. 7 marked for identification.)</p> <p>3 BY MS. DAVIS:</p> <p>4 Q I'm handing you what's been marked as Exhibit Number 7. Do you recognize this PowerPoint?</p> <p>5</p> <p>6</p> <p>7 A Not specifically.</p> <p>8 Q Okay. Let's just walk through a couple of things, then. Do you remember being trained on Wisconsin State Statute 302.38? That's on the first page.</p> <p>9</p> <p>10</p> <p>11 A I remember hearing about that.</p> <p>12 Q Do you remember hearing about Wisconsin Statute 302.365? It's on the second page.</p> <p>13</p> <p>14 A I remember hearing about this.</p> <p>15 Q Okay. Then turning to the third page, do you remember hearing about Administrative Code 350?</p> <p>16</p> <p>17 A Yes.</p> <p>18 Q On the top left slide on Page 3, is that the legal requirement that you remember being trained on?</p> <p>19</p> <p>20 A Yes.</p> <p>21 Q If you turn to Page 9, do you remember being trained on the case law listed on this page?</p> <p>22</p> <p>23 A Yep. Yes.</p> <p>24 Q And if you flip over to Page 10, on the top right slide it says, "Duties of the Jail Officer.</p> <p>25</p>	<p style="text-align: right;">Page 37</p> <p>1 Q Okay. So is it fair to say that of those three topics we talked about on this slide, would those be areas where you would call the nurse as opposed to doing something yourself?</p> <p>2</p> <p>3</p> <p>4</p> <p>5 A Yes.</p> <p>6 MS. KUGLER: Objection to form.</p> <p>7 BY MS. DAVIS:</p> <p>8 Q Was this training -- scratch that. During this training, were you instructed on when you were to contact medical staff?</p> <p>9</p> <p>10</p> <p>11 A Yes.</p> <p>12 Q Okay. All right. The training for jail health care and working with special needs inmates were both done during the academy, correct?</p> <p>13</p> <p>14</p> <p>15 A A general training, yes.</p> <p>16 Q Okay. Who led the trainings in the academy?</p> <p>17</p> <p>18 MR. ARNOLD: If you know.</p> <p>19 THE WITNESS: There was this nurse named Lisa. I don't remember her -- Krueger. Krueger, maybe. She did one of the trainings that I remember specifically. But that's the only one I remember.</p> <p>20</p> <p>21</p> <p>22</p> <p>23 BY MS. DAVIS:</p> <p>24 Q Okay. Were any of the trainings conducted by staff from the Milwaukee County Sheriff's Office?</p> <p>25</p>

<p style="text-align: right;">Page 38</p> <p>1 A I believe she did work for the Milwaukee County 2 Sheriff's Office. 3 Q So were all the instructors employees of the 4 Milwaukee County Sheriff's Office? 5 MR. ARNOLD: Objection. Foundation. 6 MS. KUGLER: Objection. 7 BY MS. DAVIS: 8 Q If you know, were the trainings provided by 9 employees of the Milwaukee County Sheriff's Office? 10 A The only one I remember was Lisa, and she was 11 employed by the Milwaukee County Sheriff's Office. 12 Q Okay. Did you have any trainings for employees of 13 the Milwaukee County Sheriff's Office, where 14 someone that did not work for the Milwaukee County 15 Sheriff's Office was brought in to conduct the 16 training? 17 A Just the times when Armor gave presentations. 18 That's the only one I remember. 19 Q Okay. Outside of Armor and the Milwaukee County 20 Sheriff's Office, do you recall any other group 21 that conducted a training that you attended while 22 working for the Milwaukee County Jail? 23 MS. KUGLER: Objection. Form. 24 THE WITNESS: Not that I can remember 25 right away.</p>	<p style="text-align: right;">Page 40</p> <p>1 from the 9th into the 10th of March in 2014? 2 MS. KUGLER: Objection. Form. 3 MS. DAVIS: Actually, let me take it 4 back. 5 Q Why is your name in both of these columns? 6 A Because I worked on both of those days. 7 Q Okay. Did you work the third shift on both days? 8 A It says I did. 9 Q Okay. And you were in the fourth floor control on 10 both days? 11 A Yes. 12 Q Okay. Being stationed on the fourth floor control, 13 did you ever leave and go to any other housing 14 units? 15 A Well, on fourth floor control, we sit on the floor 16 control, and every 30 minutes we go into the three 17 housing units and conduct inspections. 18 Q What are the three housing units? 19 A 4A, 4B, and 4C. 20 Q Would you inspect all three of those units by 21 yourself? 22 A No, um, we have a partner. So on that specific 23 day, we come up with a, um, method, a way -- we 24 come up with an agreement of how we're going to do 25 the inspections.</p>
<p style="text-align: right;">Page 39</p> <p>1 MS. DAVIS: Okay. All right. 2 (Exh. 8 marked for identification.) 3 BY MS. DAVIS: 4 Q I'm handing you what's been marked as 5 Exhibit Number 8. Do you recognize this document? 6 A No. 7 Q Okay. Based on the title of the document, do you 8 know what it is? 9 A It looks like the monthly shift assignments. 10 Q Okay. And is that your name in the bottom left 11 column close to where the word "3rd" is written? 12 A Yes. Towards the middle. 13 Q And next to your name it says "4FC"? 14 A Yes. 15 Q What does that stand for? 16 A "Fourth floor control". 17 Q And what does that mean? 18 A That means for third shift on that specific date, I 19 was working on fourth floor control. 20 Q Is that the entire fourth floor? 21 A Yes. 22 Q Okay. And then almost parallel in the next column 23 over, is that your name as well? 24 A Yes. 25 Q And is that because the third shift carried over</p>	<p style="text-align: right;">Page 41</p> <p>1 Q Okay. And would both of you do the inspection at 2 the same time? 3 A No. Somebody has to sit on the floor control. 4 Q Okay. 5 A At all times. 6 Q How do you -- how do you conduct the inspection? 7 Can you just walk me through what that process is? 8 A Well, like I said, you and your partner come up 9 with an agreement of how you're going to do the 10 inspections, and you can start in any -- any one of 11 the three housing units I just named, you can start 12 on any one. 13 Um, sometimes, um, based off the sex of the 14 inmates, the female would just do the female pods 15 and the male would do -- would not go in there at 16 all. So at one time the females were in A and 17 C, so then I would have to do those the entire 18 night, while the male officer would just do B. 19 Or me and my partner, if we were both 20 females, we would go in and do the inspections. 21 We'll do A, B, and C a couple times, and the next 22 person will do it a couple times. We'll do half of 23 the inspections a night, and then the second half 24 of the shift the other person will do them. 25 Q Okay.</p>